

OCT 04 2016



September 27, 2016

VIA PRIORITY EXPRESS MAIL

Gregory Cain
President / Agent for Service of Process
Humboldt Sanitation & Recycle
2585 Central Avenue
McKinleyville, CA 95519

Tasha Eisner
Vice President
Humboldt Sanitation & Recycle
PO Box 2812
McKinleyville, CA 95519

**RE: NOTICE OF VIOLATIONS AND INTENT TO FILE SUIT UNDER THE FEDERAL
WATER POLLUTION CONTROL ACT ("CLEAN WATER ACT") (33 U.S.C. §§
1251 *et seq.*)**

Dear Mr. Cain and Ms. Eisner:

This firm represents Humboldt Baykeeper, a California non-profit association, in regard to violations of the Clean Water Act ("CWA" or "the Act") occurring at the Humboldt Sanitation & Recycle ("HSR") facility located at, near, or adjacent to 2585 Central Avenue, in unincorporated McKinleyville, Humboldt County, CA 95519 (the "Facility"). The Facility is home to at least five separately named business operations, including but not limited to, Humboldt Sanitation and Humboldt Recycling. Pursuant to the Notice of Intent under California's General Industrial Storm Water Permit (see below) the reporting entity is Humboldt Sanitation Recycle, with waste discharger identification number 1 12I012825. This letter is being sent to you as the responsible owners, officers, and/or operators of the Facility. Unless otherwise noted, Humboldt Sanitation & Recycle shall hereinafter be referred to as "HSR," and Tasha Eisner and Greg Cain shall hereinafter be collectively referred to as the "Owners/Operators." Humboldt Baykeeper is a non-profit association dedicated to safeguarding coastal resources, including Widow White Creek, into which HSR discharges polluted storm water, for the health, enjoyment, and economic strength of the Humboldt Bay community.

HSR is in ongoing violation of the substantive and procedural requirements of the CWA, 33 U.S.C. § 1251 *et seq.*; and California's General Industrial Storm Water Permit, National Pollution Discharge Elimination System ("NPDES") General Permit No.

CAS000001 ("General Permit"), Water Quality Order No. 97-03-DWQ ("1997 General Permit"), as superseded by Order No. 2015-0057-DWQ ("2015 General Permit").¹

The 1997 General Permit was in effect between 1997 and June 30, 2015, and the 2015 General Permit went into effect on July 1, 2015. As will be explained below, the 2015 General Permit includes many of the same fundamental requirements, and implements many of the same statutory requirements, as the 1997 General Permit. Violations of the General Permit constitute ongoing violations for purposes of CWA enforcement. 2015 General Permit, Finding A.6.

Pursuant to Section 309(d) of the Act (33 U.S.C. § 1319(d)) and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4) each separate violation of the Act subjects HSR to a penalty of up to \$37,500 per day, per violation for all violations occurring during the period commencing five years prior to the date of this Notice of Violation and Intent to File Suit. In addition to civil penalties, Humboldt Baykeeper will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) of the Act (33 U.S.C. §§ 1365(a), (d)) and such other relief as permitted by law. Lastly, Section 505(d) of the Act (33 U.S.C. § 1365(d)) permits prevailing parties to recover costs and fees including attorneys' fees.

The CWA requires that sixty (60) days prior to the initiation of a citizen-enforcement action under Section 505(a) of the Act (33 U.S.C. § 1365(a)), a citizen enforcer must give notice of its intent to file suit. Notice must be given to the alleged violator, the U.S. Environmental Protection Agency, and the Chief Administrative Officer of the water pollution control agency for the State in which the violations occur. See 40 C.F.R. 135.2.

As required by the Act, this letter provides statutory notice of the violations that have occurred, and continue to occur, at the Facility. 40 C.F.R. § 135.3(a). At the expiration of sixty (60) days from the date of this letter, Humboldt Baykeeper intends to file suit under Section 505(a) of the Act (33 U.S.C. § 1365(a)) in federal court against Humboldt Sanitation & Recycle for violations of the Act and the General Permit.

I. Background

A. The Clean Water Act

Congress enacted the CWA in 1972 in order to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." 33 U.S.C. § 1251. The Act prohibits the discharge of pollutants into United States waters except as authorized by the statute. 33 U.S.C. § 1311; *San Francisco Baykeeper, Inc. v. Tosco Corp.*, 309 F.3d 1153, 1156 (9th Cir. 2002). The Act is administered largely through the

¹ HSR submitted a NOI to comply with the General Permit for the Facility on or about May 19, 2015.

NPDES permit program. 33 U.S.C. § 1342. In 1987, the Act was amended to establish a framework for regulating storm water discharges through the NPDES system. Water Quality Act of 1987, Pub. L. 100-4, § 405, 101 Stat. 7, 69 (1987) (codified at 33 U.S.C. § 1342(p)); *see also Env'tl. Def. Ctr., Inc. v. EPA*, 344 F.3d 832, 840-41 (9th Cir. 2003) (describing the problem of storm water runoff and summarizing the Clean Water Act's permitting scheme). The discharge of pollutants without an NPDES permit, or in violation of a NPDES permit, is illegal. *Ecological Rights Found. v. Pac. Lumber Co.*, 230 F.3d 1141, 1145 (9th Cir. 2000).

Much of the responsibility for administering the NPDES permitting system has been delegated to the states. *See* 33 U.S.C. § 1342(b); *see also* Cal. Water Code § 13370 (expressing California's intent to implement its own NPDES permit program). The CWA authorizes states with approved NPDES permit programs to regulate industrial storm water discharges through individual permits issued to dischargers, as well as through the issuance of a single, statewide general permit applicable to all industrial storm water dischargers. 33 U.S.C. § 1342(b). Pursuant to Section 402 of the Act, the Administrator of EPA has authorized California's State Board to issue individual and general NPDES permits in California. 33 U.S.C. § 1342.

B. California's General Permit for Storm Water Discharges Associated with Industrial Activities

Between 1997 and June 30, 2015, the General Permit in effect was Order No. 97-03-DWQ, which Humboldt Baykeeper refers to as the "1997 General Permit." On July 1, 2015, pursuant to Order No. 2015-0057-DWQ the General Permit was reissued, including many of the same fundamental terms as the prior permit. For the purposes of this notice letter, Humboldt Baykeeper refers to the reissued permit as the "2015 General Permit." The 2015 General Permit rescinded in whole the 1997 General Permit, except for the expired permit's requirement that annual reports be submitted by July 1, 2015, and for purposes of CWA enforcement. 2015 General Permit, Finding A.6.

Facilities discharging, or having the potential to discharge, storm water associated with industrial activities that have not obtained an individual NPDES permit must apply for coverage under the General Permit by filing a Notice of Intent to Comply ("NOI"). 1997 General Permit, Provision E.1; 2015 General Permit, Standard Condition XXI.A. Facilities must file their NOIs before the initiation of industrial operations. *Id.*

Facilities must strictly comply with all of the terms and conditions of the General Permit. A violation of the General Permit is a violation of the CWA. The General Permit contains three primary and interrelated categories of requirements: (1) discharge prohibitions, receiving water limitations and effluent limitations; (2) Storm Water Pollution Prevention Plan ("SWPPP") requirements; and (3) self-monitoring and reporting requirements.

C. HSR's McKinleyville Facility

HSR's industrial facility at McKinleyville consists of an office / shop, parking lot, recycling collection area, compactor, baling shed, truck parking area and various storage areas for bins, bales and containers. The business operations at the Facility include but are not limited to, refuse and recycling services, portable toilet rental and waste disposal services, septic tank services, restroom trailer rentals, jobsite trailer and other rentals. The industrial activities of the Facility fall under Standard Industrial Classification ("SIC") Codes 5093, scrap and waste materials, and 4953, Landfills and Land Application Facilities.

Upon information and belief, the Facility operates 7 days a week, 365 days a year – with multiple trucks and other vehicles exiting the Facility and returning every day, hauling garbage, materials for recycling and portable toilets; with other trucks and vehicles coming periodically every week for pickups of recycling commodities. Humboldt Baykeeper estimates that hundreds of cars visit the Facility every day to deliver recycling materials and garbage.

HSR collects and discharges certain storm water associated with industrial activities pursuant to the General Permit through a pipe identified in its annual reports as "outflow pipe". These discharges enter Widow White Creek, which is a tributary to the Mad River (reaching the Mad River shortly after the confluence with Norton Creek). Widow White Creek, Norton Creek, and the Mad River are waters of the United States within the meaning of the CWA. Upon information and belief, there are other locations at the Facility discharging storm water associated with industrial activities, namely from borders and other runoff areas of the Facility. These discharges also enter Widow White Creek, a tributary to the Mad River.

The General Permit requires HSR to analyze storm water samples for Total Suspended Solids ("TSS"), pH, and Oil and Grease. 1997 General Permit, Section B.5.c.i; 2015 General Permit, Section XI.B.6. Facilities under SIC Code 5093 must also analyze storm water samples for Iron, Lead, Aluminum, Zinc and Chemical Oxygen Demand, and facilities under SIC Code 4953 (Landfills and Land Application Facilities) must analyze samples for Iron. 1997 General Permit, Tables 1-2; 2015 General Permit Tables 1-2. The HSR SWPPP also requires testing for Copper, and references SIC Code 5093.

II. HSR's Violations of the Act and the General Permit

Based on its review of available public documents, Humboldt Baykeeper is informed and believes that HSR is in ongoing violation of both the substantive and procedural requirements of the CWA, and the General Permit. These violations are ongoing and continuous. Consistent with the five-year statute of limitations applicable to

citizen enforcement actions brought pursuant to the CWA, HSR is subject to penalties for violations of the Act since September 27, 2011.

Contaminated storm water and non-storm water discharges can and must be controlled for the Humboldt County and North Coastal Basin ecosystem to regain and maintain its health. Information available to Humboldt Baykeeper indicates that certain industrial operations at the Facility are conducted outdoors without adequate cover or containment to prevent non-storm water and storm water exposure to pollutant sources or direct discharge of pollutants via air deposition into surface waters.

A. HSR Discharges Storm Water Containing Pollutants in Violation of the General Permit's Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations.

HSR's storm water sampling results provide conclusive evidence of its failure to comply with the General Permit's discharge prohibitions, receiving water limitations and effluent limitations. Self-monitoring reports under the General Permit are deemed "conclusive evidence of an exceedance of a permit limitation." *Sierra Club v. Union Oil*, 813 F.2d 1480, 1493 (9th Cir. 1988).

B. HSR Discharges Non-Storm Water Containing Pollutants in Violation of the General Permit's Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations.

Information available to Humboldt Baykeeper suggests that HSR discharges quantities of unauthorized non-storm water, including but not limited to, water used to wash trucks and other vehicles, in violation of the General Permit's discharge prohibitions, receiving water limitations and effluent limitations.

C. HSR's Aerial Deposition Containing Pollutants Enters Storm Drains and Surface Waters Without NPDES Coverage.

Pollution entering surface waters via air deposition is also recognized as a significant cause of degradation of water quality. Such discharges of pollutants from industrial facilities contribute to the impairment of downstream waters and aquatic dependent wildlife. Information available to Humboldt Baykeeper indicates that outdoor industrial operations at the Facility create dust and particulate matter from, as two examples only, high-volume truck and other vehicle traffic, refuse and recycling material dumping and sorting. These activities lack containment or secondary containment. And have been ongoing since at least 2009. This dust and particulate matter migrates to surface waters and/or the storm drain system of Humboldt County.

D. Applicable Water Quality Standards

The General Permit requires that storm water discharges and authorized non-storm water discharges shall not cause or threaten to cause pollution, contamination, or nuisance. 1997 General Permit, Discharge Prohibition A.2; 2015 General Permit, Discharge Prohibition III.C. The General Permit also prohibits discharges that violate any discharge prohibition contained in the applicable Regional Water Board's Basin Plan or statewide water quality control plans and policies. 1997 General Permit, Receiving Water Limitation C.2; 2015 General Permit, Discharge Prohibition III.D. Furthermore, storm water discharges and authorized non-storm water discharges shall not adversely impact human health or the environment, and shall not cause or contribute to a violation of any water quality standards in any affected receiving water. 1997 General Permit, Receiving Water Limitations C.1, C.2; 2015 General Permit, Receiving Water Limitations VI.A, VI.B.

Dischargers are also required to prepare and submit documentation to the Regional Board upon determination that storm water discharges are in violation of the General Permit's Receiving Water Limitations. 1997 General Permit, p. VII; 2015 General Permit, Special Condition XX.B. The documentation must describe changes the discharger will make to its current storm water best management practices ("BMPs") in order to prevent or reduce any pollutant in its storm water discharges that is causing or contributing to an exceedance of water quality standards. *Id.*

The California Toxics Rule ("CTR") is an applicable water quality standard under the Permit, violation of which is a violation of Permit conditions. *Cal. Sportfishing Prot. Alliance v. Chico Scrap Metal, Inc.*, 2015 U.S. Dist. LEXIS 108314, *21 (E.D. Cal. 2015) CTR establishes numeric receiving water limits for toxic pollutants in California surface waters. 40 C.F.R. § 131.38. The CTR establishes a numeric limit for at least one of the pollutants discharged by HSR: Zinc – 0.12 mg/L (maximum concentration).

The *Water Quality Control Plan for the North Coast Region* ("Basin Plan") also sets forth water quality standards and prohibitions applicable to HSR's storm water discharges. While the Basin Plan does not specify beneficial uses for Widow White Creek, it does identify existing and potential uses for the lower Mad River, to which Widow White Creek is tributary. Thus, the existing beneficial uses for Widow White Creek include municipal water supply, agricultural supply, industrial service supply, estuarine habitat, freshwater replenishment, groundwater recharge, navigation, hydropower generation, commercial and sport fishing, wildlife habitat, cold freshwater habitat, spawning, migration, aquaculture, shellfish harvesting, Native American culture, and contact and non-contact water recreation.

E. Applicable Effluent Limitations

Dischargers are required to reduce or prevent pollutants in their storm water discharges through implementation of best available technology economically achievable ("BAT") for toxic and nonconventional pollutants and best conventional pollutant control technology ("BCT") for conventional pollutants. 1997 General Permit, Effluent Limitation B.3; 2015 General Permit, Effluent Limitation V.A. Conventional pollutants include Total Suspended Solids, Oil & Grease, pH, Biochemical Oxygen Demand and Fecal Coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. 40 C.F.R. §§ 401.15-16.

Under the General Permit, benchmark levels established by the EPA ("EPA benchmarks") serve as guidelines for determining whether a facility discharging industrial storm water has implemented the requisite BAT and BCT. *Santa Monica Baykeeper v. Kramer Metals*, 619 F.Supp.2d 914, 920, 923 (C.D. Cal 2009); 1997 General Permit, Effluent Limitations B.5-6; 2015 General Permit, Exceedance Response Action XII.A.

The following EPA benchmarks have been established for pollutants discharged by HSR: Total Suspended Solids – 100 mg/L; Zinc – 0.117 mg/L; Aluminum – 0.75 mg/L; Copper 0.0123 mg/L, COD – 120 mg/l, TOC – 100 mg/L, pH – 6-9 s.u, and Iron – 1 mg/L.

F. Humboldt Sanitation & Recycle' Storm Water Sample Results

The following discharges of pollutants from the Facility have violated the discharge prohibitions, receiving water limitations, and effluent limitations of the permit.

i. Discharge of Storm Water Containing Aluminum (Al) at Concentrations in Excess of Applicable EPA Benchmark Value

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)
9/16/2015	Outflow Pipe	Al	22	0.75
2/3/2016	Outflow Pipe	Al	2.7	0.75

ii. Discharges of Storm Water Containing Zinc (Zn) at Concentrations in Excess of Applicable EPA Benchmark and CTR Values

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)	CTR Criteria (mg/L)
9/16/2015	Outflow Pipe	Zn	0.2	0.117	0.12

iii. Discharges of Storm Water Containing Iron (Fe) at Concentrations in Excess of Applicable EPA Benchmark Value

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)
10/14/2014	Outflow Pipe	Fe	18.0	1.0
3/11/2015	Outflow Pipe	Fe	10.0	1.0
9/16/2015	Outflow Pipe	Fe	37.0	1.0
2/3/2016	Outflow Pipe	Fe	3.3	1.0

iv. Discharges of Storm Water Containing Total Suspended Solids (TSS) at Concentrations in Excess of Applicable EPA Benchmark Value

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)
9/16/2015	Outflow Pipe	TSS	420	100

v. Discharges of Storm Water Containing Copper (Cu) at Concentrations in Excess of Applicable EPA Benchmark Value

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L) ^{*2}
9/16/2015	Outflow Pipe	Cu	.043	0.0123 mg/L
3/11/2015	Outflow Pipe	Cu	.013	0.0123 mg/L

² * Assuming a hardness value of 75-100 mg/L.

vi. Discharges of Storm Water Containing Chemical Oxygen Demand Solids (COD) at Concentrations in Excess of Applicable EPA Benchmark Value

Date	Discharge Point	Parameter	Concentration in Discharge (mg/L)	EPA Benchmark Value (mg/L)
3/11/2015	Outflow Pipe	COD	270	120

vii. HSR's Sample Results Are Evidence of Violations of the General Permit

HSR's sample results demonstrate violations of the General Permit's discharge prohibitions, receiving water limitations, and effluent limitations set forth above. Humboldt Baykeeper is informed and believes that the HSR has known that its storm water contains pollutants at levels exceeding General Permit standards since at least September 27, 2011.

Humboldt Baykeeper alleges that such violations occur each time storm water discharges from the Facility. Attachment A hereto, sets forth the specific rain dates on which Humboldt Baykeeper alleges that HSR has discharged storm water containing impermissible levels of TSS, Zn, Cu, COD, Fe, and Al in violation of the General Permit. 1997 General Permit, Discharge Prohibition A.2, Receiving Water Limitations C.1 and C.2; 2015 General Permit, Discharge Prohibitions III.C and III.D, Receiving Water Limitations VI.A, VI.B.

G. HSR Has Failed to Implement BAT and BCT

Dischargers must implement BMPs that fulfill the BAT/BCT requirements of the CWA and the General Permit to reduce or prevent discharges of pollutants in their storm water discharges. 1997 General Permit, Effluent Limitation B.3; 2015 General Permit, Effluent Limitation V.A. To meet the BAT/BCT standard, dischargers must implement minimum BMPs and any advanced BMPs set forth in the General Permit's SWPPP Requirements provisions where necessary to reduce or prevent pollutants in discharges. See 1997 General Permit, Sections A.8.a-b; 2015 General Permit, Sections X.H.1-2.

HSR has failed to implement the minimum BMPs required by the General Permit, including: good housekeeping requirements; preventive maintenance requirements; spill and leak prevention and response requirements; material handling and waste management requirements; erosion and sediment controls; employee training and quality assurance; and record keeping. 1997 General Permit, Sections A.8.a(i-x); 2015 General Permit, Sections X.H.1(a-g).

HSR has further failed to implement advanced BMPs necessary to reduce or prevent discharges of pollutants in its storm water sufficient to meet the BAT/BCT standards, including: exposure minimization BMPs; containment and discharge reduction BMPs; treatment control BMPs; or other advanced BMPs necessary to comply with the General Permit's effluent limitations. 1997 General Permit, Section A.8.b; 2015 General Permit, Sections X.H.2.

Each day the Owners/Operators have failed to develop and implement BAT and BCT at the Facility in violation of the General Permit is a separate and distinct violation of Section 301(a) of the CWA (33 U.S.C. § 1311(a)). The violations described above were at all times in violation of Section A of the 1997 General Permit, and Section X of the 2015 General Permit. Accordingly, the Owners/Operators have been in violation of the BAT and BCT requirements at the Facility every day since at least September 27, 2016.

H. HSR Has Failed to Develop and Implement an Adequate Storm Water Pollution Plan

The General Permit requires dischargers to develop and implement a site-specific SWPPP. 1997 General Permit, Section A.1; 2015 General Permit, Section X.A. The SWPPP must include, among other elements: (1) the facility name and contact information; (2) a site map; (3) a list of industrial materials; (4) a description of potential pollution sources; (5) an assessment of potential pollutant sources; (6) minimum BMPs; (7) advanced BMPs, if applicable; (8) a monitoring implementation plan; (9) annual comprehensive facility compliance evaluation; and (10) the date that the SWPPP was initially prepared and the date of each SWPPP amendment, if applicable. *See id.*

Dischargers must revise their SWPPP whenever necessary and certify and submit via the Regional Board's Storm Water Multiple Application and Report Tracking System ("SMARTS") their SWPPP within 30 days whenever the SWPPP contains significant revisions(s); and, certify and submit via SMARTS for any non-significant revisions not more than once every three (3) months in the reporting year. 2015 General Permit, Section X.B; see also 1997 General permit, Section A.

Humboldt Baykeeper's investigation indicates that HSR has been operating with an inadequately developed or implemented SWPPP in violation of General Permit requirements. HSR has failed to evaluate the effectiveness of its BMPs and to revise its SWPPP as necessary, resulting in the Facility's numerous effluent limitation violations. The Owners/Operators of HSR are not sampling at each discharge location identified in the SWPPP, or testing for all required parameters considering the industrial activity and the site.

Each day the Owners/Operators failed to develop and implement an adequate SWPPP is a violation of the General Permit. The SWPPP violations described above were at all times in violation of Section A of the 1997 General Permit, and Section X of the 2015 General Permit. The Owners/Operators have been in violation of these requirements at the Facility every day since at least September 27, 2016.

III. Persons Responsible for the Violations

Humboldt Baykeeper puts HSR on notice that it is the entity responsible for the violations described above. If additional persons are subsequently identified as also being responsible for the violations set forth above, Humboldt Baykeeper puts HSR on formal notice that it intends to include those persons in this action.

IV. Name and Address of Noticing Party

The name, address, and telephone number of the noticing party is as follows:

Jennifer Kalt, Director
Humboldt Baykeeper
1385 Eighth Street, Suite 228
Arcata, CA 95521
(707) 825 1020
www.humboldtbaykeeper.org

V. Counsel

Humboldt Baykeeper has retained legal counsel to represent it in this matter. Please direct all communications to:

Jason R. Flanders
Anthony M. Barnes
AQUA TERRA AERIS LAW GROUP
828 San Pablo Ave
Albany, CA 94706
(415) 326-3173
amb@atalawgroup.com

VI. Conclusion

Humboldt Baykeeper believes this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. We intend to file a citizen suit under Section 505(a) of the CWA against Humboldt Sanitation & Recycle and its agents for the above-referenced violations upon the expiration of the 60-day notice period. If you wish to pursue remedies in the absence of litigation, we suggest that you initiate those



discussions within the next twenty (20) days so that they may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason R. Flanders". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jason R. Flanders
Anthony M. Barnes
ATA Law Group
Counsel for Humboldt Baykeeper

SERVICE LIST

VIA CERTIFIED MAIL

Gina McCarthy, Administrator
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Alexis Straus, Acting Regional
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Matthias St John, Executive Officer North
Coast Regional Water Quality Control
Board 5500 Skyline Blvd, Ste A
Santa Rosa, CA 95403

EXHIBIT A

Rain Data from MCKINLEYVILLE 2.7 SE, CA US GHCND:US1CAHM0004

9-25-2011 - 9-20-2016

Days with Precipitation over .1

Date	Precipitation (Inches)
9.25.11	.34
10.3.11	.59
10.4.11	.48
10.5.11	1.49
10.6.11	1.52
10.10.11	.76
10.11.11	.79
11.3.11	.34
11.4.11	.19
11.6.11	1.28
11.7.11	.15
11.17.11	.42
11.18.11	.52
11.19.11	.44
11.22.11	.24
11.23.11	.24
11.24.11	1.29
11.25.11	.14
12.15.11	.49
12.26.11	.16
12.28.11	.20
12.29.11	.60
12.30.11	1.49
12.31.11	.10
1.5.12	.12
1.16.12	.12
1.19.12	2.12
1.20.12	1.71
1.21.12	2.31
1.22.12	.14
1.23.12	.21
1.25.12	1.04
1.26.12	.79
2.1.12	.53
2.8.12	.21
2.10.12	.21
2.11.12	.27
2.13.12	.92
2.18.12	.13
2.25.12	.26
2.29.12	.64
3.1.12	.70

Date	Precipitation (Inches)
3.6.12	.37
3.11.12	.24
3.13.12	1.44
3.15.12	.21
3.16.12	1.77
3.17.12	.79
3.18.12	.29
3.20.12	.37
3.21.12	.30
3.22.12	.88
3.24.12	.29
3.27.12	.17
3.28.12	.81
3.29.12	.11
3.30.12	3.10
3.31.12	1.10
4.1.12	.31
4.2.12	.49
4.4.12	.66
4.5.12	.36
4.10.12	.11
4.11.12	.58
4.12.12	.52
4.13.12	.81
4.17.12	.22
4.19.12	.69
4.20.12	.22
4.26.12	.83
5.3.12	.21
5.4.12	.25
5.22.12	.41
6.4.12	.31
6.5.12	.97
6.23.12	.84
6.26.12	.13
7.1.12	.15
7.17.12	.31
7.18.12	.16
10.16.12	1.34
10.22.12	1.08
10.23.12	.32
10.24.12	.31
11.1.12	.48
11.8.12	.49
11.9.12	.47
11.10.12	.13
11.13.12	.20
11.17.12	.31

Date	Precipitation (Inches)
11.18.12	.91
11.20.12	.41
11.21.12	1.21
11.28.12	.11
11.29.12	.62
11.30.12	1.86
12.1.12	.91
12.2.12	2.77
12.5.12	.81
12.12.12	.50
12.16.12	.12
12.17.12	.77
12.19.12	.31
12.21.12	2.31
12.22.12	1.34
12.23.12	.55
12.26.12	1.09
12.27.12	.49
12.29.12	.16
1.6.13	.10
1.10.13	.86
1.11.13	.34
1.24.13	.83
1.26.13	.52
1.28.13	.19
2.7.13	.44
2.8.13	.39
2.19.13	.40
2.20.13	.26
2.23.13	.21
2.28.13	.53
3.1.13	.14
3.6.13	1.52
3.7.13	.27
3.20.13	.20
3.21.13	.52
3.26.13	.35
3.27.13	.14
3.31.13	.36
4.1.13	.10
4.4.13	.33
4.5.13	.71
4.6.13	.31
4.7.13	.23
4.8.13	1.09
5.7.13	.40

Date	Precipitation (Inches)
5.16.13	.21
5.26.13	.24
5.27.13	.57
5.28.13	.53
5.29.13	.12
6.24.13	.23
6.26.13	.34
9.17.13	.11
9.18.13	.15
9.21.13	.97
9.22.13	.24
9.23.13	.24
9.25.13	.30
9.29.13	1.22
9.30.13	1.84
11.3.13	.17
11.8.13	.24
11.12.13	.12
11.13.13	.14
11.16.13	.11
11.19.13	.39
11.20.13	.38
12.3.13	.39
12.7.13	.41
1.8.14	.12
1.9.14	.27
1.11.14	.32
1.12.14	.34
1.29.14	.51
1.30.14	.33
2.7.14	.69
2.8.14	.60
2.9.14	.49
2.10.14	.69
2.13.14	1.21
2.14.14	1.01
2.15.14	1.21
2.16.14	.60
2.18.14	.13
2.19.14	.52
2.27.14	.44
2.28.14	.22
3.1.14	.11
3.2.14	.11
3.3.14	.68

Date	Precipitation (Inches)
3.4.14	.34
3.5.14	.24
3.6.14	.12
3.9.14	.76
3.10.14	2.77
3.17.14	.29
3.25.14	.36
3.26.14	.66
3.27.14	.40
3.29.14	1.81
4.1.14	.52
4.20.14	.10
4.22.14	.35
4.24.14	.55
4.25.14	.35
4.27.14	.13
5.5.14	.31
5.9.14	.28
5.10.14	.12
5.18.14	.13
6.26.14	.69
9.18.14	1.07
9.24.14	.77
9.25.14	2.01
10.15.14	.74
10.18.14	.34
10.20.14	1.02
10.21.14	.14
10.23.14	1.14
10.24.14	.98
10.25.14	.21
10.26.14	.26
10.29.14	.13
10.31.14	.92
11.7.14	.31
11.13.14	.41
11.14.14	.39
11.15.14	.34
11.20.14	.82
11.21.14	.40
11.22.14	1.86
11.23.14	.10
11.29.14	1.10
12.3.14	.52
12.4.14	.12

Date	Precipitation (Inches)
12.6.14	1.48
12.8.14	.30
12.11.14	2.07
12.12.14	.91
12.13.14	.34
12.16.14	.22
12.17.14	.64
12.18.14	.29
12.19.14	.87
12.20.14	.71
12.21.14	2.41
12.22.14	1.09
12.25.14	.74
1.16.15	.62
1.17.15	.12
1.18.15	1.54
2.2.15	.96
2.3.15	.93
2.5.15	.15
2.6.15	1.03
2.7.15	1.04
2.9.15	.40
2.10.15	.11
3.16.15	.53
3.21.15	.47
3.22.15	.36
3.23.15	.76
3.24.15	1.03
3.25.15	.18
3.31.15	.34
3.3.15	.93
4.5.15	.15
4.6.15	.25
4.7.15	1.20
4.12.15	.10
4.14.15	.57
8.29.15	.44
9.17.15	.41
10.17.15	.11
10.26.15	.12
10.28.15	.77
11.1.15	.83
11.2.15	.20
11.8.15	.41

Date	Precipitation (Inches)
11.9.15	.36
11.15.15	1.19
11.16.15	.47
11.18.15	.62
11.20.15	.40
11.24.15	.77
11.25.15	.26
12.2.15	.13
12.3.15	.14
12.4.15	1.11
12.6.15	.46
12.9.15	1.51
12.10.15	.77
12.11.15	1.27
12.12.15	1.01
12.13.15	2.69
12.14.15	.80
12.17.15	.34
12.18.15	1.69
12.19.15	1.22
12.20.15	.19
12.21.15	.77
12.22.15	1.15
12.23.15	.37
12.24.15	1.37
12.25.15	.91
12.28.15	.61
12.30.15	.30
1.4.16	.21
1.5.16	.69
1.6.16	.32
1.8.16	.12
1.9.16	.32
1.10.16	.42
1.12.16	.10
1.13.16	.57
1.14.16	.61
1.15.16	.77
1.16.16	.41
1.17.16	1.21
1.18.16	1.88
1.19.16	.61
1.22.16	.71
1.23.16	.72

Date	Precipitation (Inches)
1.24.16	.36
1.25.16	.30
1.26.16	.10
1.29.16	1.69
1.30.16	.77
2.13.16	.26
2.20.16	.26
2.22.16	.14
2.27.16	.37
2.28.16	.13
3.2.16	.19
3.3.16	.41
3.5.16	.34
3.6.16	1.66
3.7.16	.22
3.9.16	.36
3.10.16	1.01
3.12.16	.96
3.13.16	.68
3.14.16	.66
3.15.16	.20
3.21.16	.65
3.22.16	1.81
3.23.16	.14
3.27.16	.24
4.4.16	.31
4.9.16	.12
4.13.16	.22
4.14.16	.72
4.15.16	.24
4.22.16	.82
4.23.16	.32
4.24.16	.34
4.27.16	.34
4.28.16	.16
5.6.16	.31
5.21.16	.26
5.22.16	.12
7.9.16	.57
7.10.16	.10

